



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

January 19, 2022

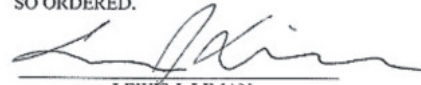
The request for a stay is denied, but the
deadline for defendants' reply brief is extended
to March 11, 2022.

VIA ECF

Hon. Lewis J. Liman
United States District Judge
United States District Court
500 Pearl Street
New York, New York 10007

1/20/22

SO ORDERED.


LEWIS J. LIMAN
United States District Judge

Re: *Keane, et al. v. Velarde, et al.*, No. 21 Civ. 8257 (LJL)

Dear Judge Liman:

This Office represents the government in this action in which the plaintiffs seek an order compelling U.S. Citizenship and Immigration Services (“USCIS”) to issue certificates of citizenship to plaintiffs Daniel Daskalakis and Jason Daskalakis. Briefing of the government’s motion to dismiss is currently underway, with the government having filed its motion on December 7, 2021, and the plaintiffs having filed their opposition to the motion on December 22, 2021. *See* ECF Nos. 33-35. On December 22, 2021, the Court granted the government’s request to extend the date for it to file its reply brief to January 21, 2022. *See* ECF No. 36. I write respectfully to request on behalf of all parties that the Court stay this action to permit the parties to discuss a potential resolution to this dispute. The parties respectfully submit that the requested stay is in the interests of efficiency and conservation of judicial and party resources. If the Court grants the request, the parties will file a status letter no later than thirty days from the Court’s order.

I thank the Court for its consideration of this letter.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

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cc: Counsel of record (via ECF)